

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	CASE NO: 14-50585
	§	
RAMON GARZA GONZALEZ	§	
ROSALBA RAMIREZ GONZALEZ	§	
DEBTOR(S)	§	CHAPTER 13 PROCEEDING
	§	
	§	
MARY K. VIEGELAHN,	§	
CHAPTER 13 TRUSTEE	§	
MOVANT	§	
vs.	§	
	§	
RAMON GARZA GONZALEZ	§	
ROSALBA RAMIREZ GONZALEZ	§	
RESPONDENT(S)	§	

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS CHAPTER 13 CASE FOR
FAILURE TO TURNOVER TAX RETURN AND/OR REFUND WITH NOTICE AND
OPPORTUNITY TO OBJECT**

TO THE HONORABLE JUDGE OF SAID COURT:

Come now the above Debtors herein, and file this, their Response to Trustee's Motion to Dismiss Chapter 13 Case For Failure To Turnover Tax Return And/Or Refund With Notice And Opportunity to Object filed by Mary K. Viegelahn, Chapter 13 Trustee ("Trustee"), and in support thereof would show the Court as follows:

I.

Debtors have either filed or will file their 2014 Federal Income Tax Return with the Internal Revenue Service prior to the hearing on Trustee's Motion to Dismiss. A copy of said tax return will also be forwarded to the Chapter 13 Trustee prior to the hearing. Furthermore, to the extent that the Debtors have received a tax refund, their position is that it is not disposable income and would request the Court to allow them to keep said refund.

II.

Debtors intends to oppose the requests made in the Prayer paragraph of the Trustee's Motion.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that Trustee, Mary K. Viegelahn's, Motion to Dismiss and Notice of Hearing be denied, and for such other and further relief to which Debtors may be entitled.

Respectfully submitted,

OJEDA LAW OFFICE
King William Professional Building
809 S. St. Mary's St.
San Antonio, Texas 78205
(210) 349-3232 Telephone
(210) 349-3239 Facsimile

By: 

Ricardo Ojeda, Jr.
State Bar No. 24033606
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on the 10th day of June, 2015 to:

14-50585-rbk|U.S. BANKRUPTCY COURT|615 E. HOUSTON STREET, ROOM 597|SAN ANTONIO, TX 78205-2055|
14-50585-rbk|Ace Cash Express |1960 SW Military Dr.|San Antonio, TX 78221-1474|
14-50585-rbk|Ace Cash Express |c/o National Credit Adjusters|PO Box 3023|Hutchinson, KS 67504-3023|
14-50585-rbk|Albert Uresti |Tax Assessor-Collector|P.O. Box 839950|San Antonio, TX 78283-3950|
14-50585-rbk|Amber Way, LLC |4300 Stevens Creek Blvd., Suite 275|San Jose, CA 95129-1265|
14-50585-rbk|American InfoSource LP as agent for |Midland Funding LLC|PO Box 268941|Oklahoma City, OK 73126-8941|
14-50585-rbk|Atlas Credit Co Inc. |1719 SW Military Drive|San Antonio, TX 78221-1430|
14-50585-rbk|Attorney General of the US |Main Justice Bldg #5111|10th & Constitution Ave NW|Washington, DC 20530-0001|
14-50585-rbk|Barri Finance |2323 SW Military Dr. #8|San Antonio, TX 78224-1406|
14-50585-rbk|Barri Finance Co |2323 SW Military Dr #8|San Antonio, TX 78224-1406|
||duplicate
14-50585-rbk|Bexar County |c/o Don Stecker|711 Navarro, Suite 300|San Antonio, TX 78205-1749|
14-50585-rbk|Cavalry SPV I, LLC |500 Summit Lake Drive, Ste 400|Valhalla, NY 10595-1340|
14-50585-rbk|Check 'N Go |7755 Montgomery Rd Suite 400|Cincinnati, OH 45236-4197|
14-50585-rbk|Citibank |c/o ARS National Services, Inc.|PO Box 463023|Escondido, CA 92046-3023|
14-50585-rbk|Citimortgage |PO Box 6243|Sioux Falls, SD 57117-6243|
14-50585-rbk|Dora Isabel Gonzalez |3235 Twining|San Antonio, TX 78211-4570|
14-50585-rbk|EZ Money |9719 Poteet Jourdanton Frwy Ste 102|San Antonio, TX 78211-4573|
14-50585-rbk|Ernesto's Auto Sales |1854 Rigsby Ave|San Antonio, TX 78210-3324|
14-50585-rbk|FCI Lender Services, Inc. |PO Box 27370|Anaheim, CA 92809-0112|
14-50585-rbk|Garza Finance, LLC |7211 Somerset Rd|San Antonio, TX 78211-3667|
14-50585-rbk|Garza Finance, LLC |7211 Somerset Rd.|San Antonio, TX 78211-3667|
||duplicate
14-50585-rbk|Internal Revenue Service |PO Box 7346|Philadelphia, PA 19101-7346|
14-50585-rbk|Ojeda Law Office |King William Professional Building|809 S. St. Mary's St.|San Antonio, TX 78205-3408|
14-50585-rbk|Quantum3 Group LLC as agent for |CF Medical LLC|PO Box 788|Kirkland, WA 98083-0788|
14-50585-rbk|Rick's Auto Sales |3127 Pleasanton Rd|San Antonio, TX 78221-2325|
14-50585-rbk|Speedy Cash |2337 SW Military Dr|San Antonio, TX 78224-1406|
14-50585-rbk|Texas Farm Bureau Mutual Insurance |c/o Acclaim Resource Partners|14171 Carole Drive|Bloomington, IL 61705-9900|
14-50585-rbk|Time Warner |c/o Credit Collection Services|Two Wells Avenue|Newton, MA

02459-3225| ||

14-50585-rbk|US Attorney's Office |601 NW Loop 410, Ste. 600|San Antonio, TX 78216-5597| |||

14-50585-rbk|United States Trustee - SA12 |US Trustee's Office|615 E Houston, Suite 533|PO
Box 1539|San Antonio, TX 78295-1539 ||

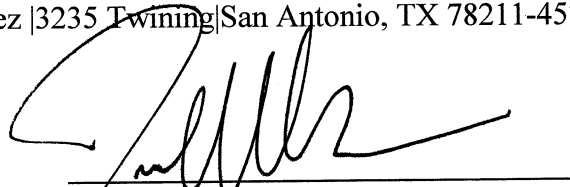
14-50585-rbk|Wells Fargo Bank |PO Box 63491 MAC A0143-042|San Francisco, CA
94163-0001| |||

14-50585-rbk|Mary K Viegelahn |Chapter 13 Trustee|10500 Heritage Blvd Suite 201|San
Antonio, TX 78216-3631|||

14-50585-rbk|Ramon Garza Gonzalez |3235 Twining|San Antonio, TX 78211-4570|||

14-50585-rbk|Ricardo Ojeda Jr |Ojeda Law Office|809 S St Mary's St|San Antonio, TX
78205-3408|||

14-50585-rbk|Rosalba Ramirez Gonzalez |3235 Twining|San Antonio, TX 78211-4570|||



Ricardo Ojeda Jr.